

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

RALPH S. JANVEY, IN HIS CAPACITY AS  
COURT-APPOINTED RECEIVER FOR THE  
STANFORD INTERNATIONAL BANK, LTD.,  
ET AL.,

Plaintiff,

V.

JAMES R. ALGUIRE, ET AL.,

Defendants.

Case No. 3:09-CV-0724-N-BG

RALPH S. JANVEY, IN HIS CAPACITY AS  
COURT-APPOINTED RECEIVER FOR THE  
STANFORD INTERNATIONAL BANK, LTD.,  
ET AL.,

Plaintiff,

V.

MIGUEL VENGGER, ET AL.,

Defendants.

Case No. 3:10-CV-0366-N-BG

**RECEIVER'S CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT  
REGARDING CERTAIN DEFENDANTS' GOOD FAITH AFFIRMATIVE DEFENSE**

**CROSS-MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff Ralph S. Janvey, in his capacity as Receiver for Stanford International Bank, Ltd., et al. (the “Receiver”), files this Cross-Motion for Partial Summary Judgment Regarding Certain Defendants’ Good Faith Affirmative Defense (the “Cross-Motion”). The requirements of Local Rule 56.3(a) are satisfied by the concurrently filed brief in support of this Cross-Motion.

For the reasons set forth in the Receiver’s brief in support of this Cross-Motion, which brief and attached evidence are incorporated herein, the Receiver respectfully requests that the Court grant the Receiver’s Cross-Motion and that the Court grant the Receiver all further relief to which he may be entitled.

Dated: November 20, 2015

Respectfully submitted,

**BAKER BOTTS L.L.P.**

By: /s/ Kevin M. Sadler

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**ATTORNEYS FOR  
RECEIVER RALPH S. JANVEY**

**CERTIFICATE OF SERVICE**

On November 20, 2015, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all counsel or pro se parties of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Kevin M. Sadler  
Kevin M. Sadler